

**From:** [Jim Walker](#)  
**To:** [Dermer, Michele](#)  
**Cc:** [Robin, George](#); [Geraldine Camilli](#); [Mark Nelson](#)  
**Subject:** Fw: CA Aquifer Exemptions  
**Date:** Wednesday, July 30, 2014 12:04:07 PM

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Hi Michele,

Below is an email about the California aquifer exemption issue that followed my call with George in March 2012. I was not involved in a review of the exemptions and am not aware of the EPA follow-up on the issue.

I don't recall the details of the conversation with George except that we discussed aquifer exemptions in the context of the Sunrise permit application. My understanding is that the exemptions presented in the DOGGR application for Class II UIC primacy in 1983 were under review at that time to ensure that they are not overly broad and nonspecific concerning the horizontal and vertical limits of the exempted aquifers. All oil and gas bearing fields and pools were given blanket exemptions, but the pool boundaries were not adequately defined in the Primacy Application, which raises concerns about many of the exemptions granted at the time. The issue of the DOGGR definition of a USDW at the time also raises a concern about the validity of the aquifer exemptions for the 65 nonhydrocarbon bearing aquifers and the formation water underlying the oil or gas water contacts in oil and gas pools.

If you want additional information and/or support on this matter, please let us know.

**From:** [Jim Walker](#)  
**Sent:** Wednesday, March 28, 2012 1:08 PM  
**To:** [Mark Nelson](#) ; [Kate Rao](#)  
**Cc:** [George Robin](#)  
**Subject:** Re: CA Aquifer Exemptions

Hi,

George and I discussed this issue in a conference call on Monday, March 26. Reviewing all of the aquifer exemptions in CA would be a fairly massive undertaking since essentially all of the oil and gas producing fields and pools and 65 nonhydrocarbon bearing aquifers in CA are exempted under EPA approval of the Primacy Application. I suggest a review of the information that CDOGGR may develop in that regard and select a few high priority exempted aquifers/fields for an independent review by EPA with HWG and my support. I am available to provide any support that would be helpful.

Jim

**From:** [Mark Nelson](#)  
**Sent:** Wednesday, March 28, 2012 12:26 PM

**To:** [Kate Rao](#) ; [Jim Walker](#)  
**Subject:** CA Aquifer Exemptions

I mentioned to both of you earlier this week that a few years ago HW had conducted some GIS mapping of aquifer exemptions and I assumed it included existing exemptions in California at the time primacy was granted to the state. Just to close the loop, I dug up our mapping data and we did not map any exemptions in CA. Apparently the issue was complex enough in CA that we didn't have the budget at that time to delve into it.

I was hoping this may help Jim and George as they evaluated current exemption issues in CA, but, sorry to say, that won't be the case.

Oh well...

Mark

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